

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

<b>BIANCA CLAYBORNE,</b>	)	
individually and as parent and next	)	
friend of minors, J.C., D.W., L.W.,	)	
A.C., and P.C.,	)	
	)	
<b>Plaintiff,</b>	)	
v.	)	<b>Case No. 4:24-cv-00012</b>
	)	
<b>RUBEN BASALDUA, in his</b>	)	
<b>individual capacity, DONNIE</b>	)	
<b>CLARK, in his individual capacity,</b>	)	
<b>DOUGLAS FOSTER, in his</b>	)	
<b>individual capacity, JAMES</b>	)	
<b>THOMPSON, in his individual</b>	)	
<b>capacity, KATLYN PELHAM, in her</b>	)	
<b>individual capacity, MONTANA</b>	)	
<b>MEDINA, in her individual capacity,</b>	)	
<b>ERICA WRIGHT-GILLIAM, in her</b>	)	
<b>individual capacity, COFFEE</b>	)	
<b>COUNTY, TENNESSEE, a political</b>	)	
<b>subdivision acting by and through</b>	)	
<b>the Coffee County Sheriff's</b>	)	
<b>Department, OFFICER CRABTREE</b>	)	
<b>F/N/U, in his individual capacity, and</b>	)	
<b>COFFEE COUNTY SHERIFF'S</b>	)	
<b>DEPARTMENT JOHN DOES 1-10,</b>	)	
<b>in their respective individual</b>	)	
<b>capacities,</b>	)	
	)	
<b>Defendants.</b>	)	

**ANSWER TO COMPLAINT**  
**BY DEFENDANTS COFFEE COUNTY, TN AND OFFICER ALAN CRABTREE**

Defendants Alan Crabtree and Coffee County, Tennessee, (hereinafter collectively referred to as "these Defendants"), hereby appear, by and through counsel, and for Answer to Complaint filed against them would state as follows:

1. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 1 of the Complaint, and as such, deny the same and demand strict

proof thereof. These Defendants deny that any action taken by them was done so unlawfully, in violation of any constitutional right to Plaintiffs, or was the legal cause of any injury.

2. The allegations contained in Paragraph 2 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.
3. To the extent the allegations contained in Paragraph 3 pertain to these Defendants, it is admitted only that spike strips were placed behind the passenger rear tire of the vehicle. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.
4. For response to the allegations contained in Paragraph 4 of the Complaint, it is denied that Coffee County officers “ripped” or otherwise physically removed the children from Clayborne’s arms, placed the children in foster care, and denied the children’s return to Clayborne. These Defendants deny that any action taken by them was done so unlawfully, in violation of any constitutional right of Plaintiffs, or was the legal cause of any injury. The remainder of the allegations contained in Paragraph 4 do not pertain to these Defendants and, as such, no response is required.
5. For response to the allegations contained in Paragraph 5 of the Complaint, these Defendants deny that any action taken by them was done so unlawfully, in violation of any constitutional right of Plaintiffs, or was the legal cause of any injury.

6. For response to the allegations contained in Paragraph 6 of the Complaint, these Defendants deny that any action taken by them was done so unlawfully, in violation of any constitutional right of Plaintiffs, or was the legal cause of any injury.
7. Upon information and belief, the allegations contained in Paragraph 7 of the Complaint are admitted.
8. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 8 of the Complaint, and as such, deny the same and demand strict proof thereof.
9. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 9 of the Complaint, and as such, deny the same and demand strict proof thereof.
10. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 10 of the Complaint, and as such, deny the same and demand strict proof thereof.
11. The allegations contained in Paragraph 11 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is required, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 11, and as such, deny the same and demand strict proof thereof.
12. The allegations contained in Paragraph 12 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is required, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 12, and as such, deny the same and demand strict proof thereof.

13. The allegations contained in Paragraph 13 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is required, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 13, and as such, deny the same and demand strict proof thereof.
14. The allegations contained in Paragraph 14 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is required, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 14, and as such, deny the same and demand strict proof thereof.
15. The allegations contained in Paragraph 15 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is required, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 15, and as such, deny the same and demand strict proof thereof.
16. The allegations contained in Paragraph 16 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is required, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 16, and as such, deny the same and demand strict proof thereof.
17. The allegations contained in Paragraph 17 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is required, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 17, and as such, deny the same and demand strict proof thereof.
18. The allegations contained in Paragraph 18 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is required,

these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 18, and as such, deny the same and demand strict proof thereof.

19. The allegations contained in Paragraph 19 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is required, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 19, and as such, deny the same and demand strict proof thereof.

20. The allegations contained in Paragraph 20 of the Complaint are admitted.

21. For response to the allegations contained in Paragraph 21 of the Complaint, it is admitted that Alan Crabtree is an officer of the Coffee County Sheriff's Office. It is denied that Officer Crabtree should be sued in his individual capacity.

22. The allegations contained in Paragraph 22 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is required, these Defendants deny that any action taken by any Coffee County officer was done so unlawfully, in violation of any constitutional right of Plaintiffs, or was the legal cause of any injury.

23. The allegations contained in Paragraph 23 are admitted except these Defendants deny that any action taken by them was done so unlawfully, in violation of any constitutional right of Plaintiffs, or was the legal cause of any injury.

24. The allegations contained in Paragraph 24 of the Complaint are admitted.

25. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 25 of the Complaint, and as such, deny the same and demand strict proof thereof.

26. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 26 of the Complaint, and as such, deny the same and demand strict proof thereof.
27. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 27 of the Complaint, and as such, deny the same and demand strict proof thereof.
28. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 28 of the Complaint, and as such, deny the same and demand strict proof thereof.
29. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 29 of the Complaint, and as such, deny the same and demand strict proof thereof.
30. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 30 of the Complaint, and as such, deny the same and demand strict proof thereof.
31. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 31 of the Complaint, and as such, deny the same and demand strict proof thereof.
32. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 32 of the Complaint, and as such, deny the same and demand strict proof thereof.

33. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 33 of the Complaint, and as such, deny the same and demand strict proof thereof.
34. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 34 of the Complaint, and as such, deny the same and demand strict proof thereof.
35. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 35 of the Complaint, and as such, deny the same and demand strict proof thereof.
36. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 36 of the Complaint, and as such, deny the same and demand strict proof thereof.
37. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 37 of the Complaint, and as such, deny the same and demand strict proof thereof.
38. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 38 of the Complaint, and as such, deny the same and demand strict proof thereof.
39. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 39 of the Complaint, and as such, deny the same and demand strict proof thereof.

40. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 40 of the Complaint, and as such, deny the same and demand strict proof thereof.

41. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 41 of the Complaint, and as such, deny the same and demand strict proof thereof.

42. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 42 of the Complaint, and as such, deny the same and demand strict proof thereof.

43. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 43 of the Complaint, and as such, deny the same and demand strict proof thereof.

44. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 44 of the Complaint, and as such, deny the same and demand strict proof thereof.

45. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 45 of the Complaint, and as such, deny the same and demand strict proof thereof.

46. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 46 of the Complaint, and as such, deny the same and demand strict proof thereof.

47. Paragraph 47 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on

the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

48. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 48 of the Complaint, and as such, deny the same and demand strict proof thereof.

49. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 49 of the Complaint, and as such, deny the same and demand strict proof thereof.

50. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 50 of the Complaint, and as such, deny the same and demand strict proof thereof.

51. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 51 of the Complaint, and as such, deny the same and demand strict proof thereof.

52. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 52 of the Complaint, and as such, deny the same and demand strict proof thereof.

53. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 53 of the Complaint, and as such, deny the same and demand strict proof thereof.

54. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 54 of the Complaint, and as such, deny the same and demand strict proof thereof.

55. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 55 of the Complaint, and as such, deny the same and demand strict proof thereof.

56. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 56 of the Complaint, and as such, deny the same and demand strict proof thereof.

57. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 57 of the Complaint, and as such, deny the same and demand strict proof thereof.

58. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 58 of the Complaint, and as such, deny the same and demand strict proof thereof.

59. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 59 of the Complaint, and as such, deny the same and demand strict proof thereof.

60. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 60 of the Complaint, and as such, deny the same and demand strict proof thereof.

61. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 61 of the Complaint, and as such, deny the same and demand strict proof thereof.

62. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 62 of the Complaint, and as such, deny the same and demand strict proof thereof.

63. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 63 of the Complaint, and as such, deny the same and demand strict proof thereof.

64. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 64 of the Complaint, and as such, deny the same and demand strict proof thereof.

65. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 65 of the Complaint, and as such, deny the same and demand strict proof thereof.

66. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 66 of the Complaint, and as such, deny the same and demand strict proof thereof.

67. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 67 of the Complaint, and as such, deny the same and demand strict proof thereof.

68. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 68 of the Complaint, and as such, deny the same and demand strict proof thereof.

69. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 69 of the Complaint, and as such, deny the same and demand strict proof thereof.

70. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 70 of the Complaint, and as such, deny the same and demand strict proof thereof.

71. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 71 of the Complaint, and as such, deny the same and demand strict proof thereof.

72. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 72 of the Complaint, and as such, deny the same and demand strict proof thereof.

73. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 73 of the Complaint, and as such, deny the same and demand strict proof thereof.

74. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 74 of the Complaint, and as such, deny the same and demand strict proof thereof.

75. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 75 of the Complaint, and as such, deny the same and demand strict proof thereof.

76. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 76 of the Complaint, and as such, deny the same and demand strict proof thereof.

77. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 77 of the Complaint, and as such, deny the same and demand strict proof thereof.

78. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 78 of the Complaint, and as such, deny the same and demand strict proof thereof.

79. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 79 of the Complaint, and as such, deny the same and demand strict proof thereof.

80. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 80 of the Complaint, and as such, deny the same and demand strict proof thereof.

81. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 81 of the Complaint, and as such, deny the same and demand strict proof thereof.

82. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 82 of the Complaint, and as such, deny the same and demand strict proof thereof.

83. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 83 of the Complaint, and as such, deny the same and demand strict proof thereof.

84. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 84 of the Complaint, and as such, deny the same and demand strict proof thereof.

85. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 85 of the Complaint, and as such, deny the same and demand strict proof thereof.

86. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 86 of the Complaint, and as such, deny the same and demand strict proof thereof.

87. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 87 of the Complaint, and as such, deny the same and demand strict proof thereof.

88. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 88 of the Complaint, and as such, deny the same and demand strict proof thereof.

89. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 89 of the Complaint, and as such, deny the same and demand strict proof thereof.

90. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 90 of the Complaint, and as such, deny the same and demand strict proof thereof.

91. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 91 of the Complaint, and as such, deny the same and demand strict proof thereof.

92. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 92 of the Complaint, and as such, deny the same and demand strict proof thereof.

93. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 93 of the Complaint, and as such, deny the same and demand strict proof thereof.

94. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 94 of the Complaint, and as such, deny the same and demand strict proof thereof.

95. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 95 of the Complaint, and as such, deny the same and demand strict proof thereof.

96. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 96 of the Complaint, and as such, deny the same and demand strict proof thereof.

97. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 97 of the Complaint, and as such, deny the same and demand strict proof thereof.

98. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 98 of the Complaint, and as such, deny the same and demand strict proof thereof.

99. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 99 of the Complaint, and as such, deny the same and demand strict proof thereof.

100. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 100 of the Complaint, and as such, deny the same and demand strict proof thereof.

101. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 101 of the Complaint, and as such, deny the same and demand strict proof thereof.

102. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 102 of the Complaint, and as such, deny the same and demand strict proof thereof.

103. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 103 of the Complaint, and as such, deny the same and demand strict proof thereof.

104. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 104 of the Complaint, and as such, deny the same and demand strict proof thereof.

105. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 105 of the Complaint, and as such, deny the same and demand strict proof thereof.

106. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 106 of the Complaint, and as such, deny the same and demand strict proof thereof.

107. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 107 of the Complaint, and as such, deny the same and demand strict proof thereof.

108. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 108 of the Complaint, and as such, deny the same and demand strict proof thereof.

109. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 109 of the Complaint, and as such, deny the same and demand strict proof thereof.

110. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 110 of the Complaint, and as such, deny the same and demand strict proof thereof.

111. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 111 of the Complaint, and as such, deny the same and demand strict proof thereof.

112. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 112 of the Complaint, and as such, deny the same and demand strict proof thereof.

113. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 113 of the Complaint, and as such, deny the same and demand strict proof thereof.

114. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 114 of the Complaint, and as such, deny the same and demand strict proof thereof.

115. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 115 of the Complaint, and as such, deny the same and demand strict proof thereof.

116. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 116 of the Complaint, and as such, deny the same and demand strict proof thereof.

117. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 117 of the Complaint, and as such, deny the same and demand strict proof thereof.

118. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 118 of the Complaint, and as such, deny the same and demand strict proof thereof.

119. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 119 of the Complaint, and as such, deny the same and demand strict proof thereof.

120. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 120 of the Complaint, and as such, deny the same and demand strict proof thereof.

121. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 121 of the Complaint, and as such, deny the same and demand strict proof thereof.

122. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 122 of the Complaint, and as such, deny the same and demand strict proof thereof.

123. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 123 of the Complaint, and as such, deny the same and demand strict proof thereof.

124. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 124 of the Complaint, and as such, deny the same and demand strict proof thereof.

125. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 125 of the Complaint, and as such, deny the same and demand strict proof thereof.

126. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 126 of the Complaint, and as such, deny the same and demand strict proof thereof.

127. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 127 of the Complaint, and as such, deny the same and demand strict proof thereof.

128. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 128 of the Complaint, and as such, deny the same and demand strict proof thereof.

129. For response to the allegations contained in Paragraph 129 of the Complaint, it is admitted that DCS contacted the Coffee County Sheriff's Office for assistance pursuant to the court's protective custody order. It is further admitted that the Coffee County Sheriff's Office was ordered by Judge Perry to assist in the removal of the children. The remainder of the allegations contained in Paragraph 129 are denied or denied as stated.

130. The allegations contained in Paragraph 130 of the Complaint are denied as stated. Officer Crabtree placed spike strips behind the passenger rear tire of the vehicle.

131. The allegations contained in Paragraph 131 of the Complaint are denied.

132. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 132 of the Complaint, and as such, deny the same and demand strict proof thereof.

133. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 133 of the Complaint, and as such, deny the same and demand strict proof thereof.

134. For response to the allegations contained in Paragraph 134 of the Complaint, it is admitted that Clayborne and the children got out of the car and entered the jail lobby. These Defendants are without sufficient information and belief as to the remainder of the allegations contained in Paragraph 134, and as such, deny the same and demand strict proof thereof.

135. For response to the allegations contained in Paragraph 135 of the Complaint, it is admitted that Clayborne waited inside the jail lobby with the children. The remainder of the allegations contained in Paragraph 135 are denied to the extent they pertain to these Defendants.

136. Paragraph 136 sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

137. For response to the allegations contained in Paragraph 137 of the Complaint, it is admitted that Judge Perry ordered custody of the children to DCS. These Defendants are without sufficient information and belief as to the remainder of the allegations contained in Paragraph 137.

138. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 138 of the Complaint, and as such, deny the same and demand strict proof thereof.

139. The allegations contained in Paragraph 139 are admitted.

140. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 140 of the Complaint, and as such, deny the same and demand strict proof thereof.

141. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 141 of the Complaint, and as such, deny the same and demand strict proof thereof.

142. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 142 of the Complaint, and as such, deny the same and demand strict proof thereof.

143. For response to the allegations contained in Paragraph 143 of the Complaint, it is admitted spike strips were placed behind the rear passenger tire of the vehicle. These Defendants are without sufficient information and belief as to the remainder of the allegations contained in Paragraph 143, and as such, deny the same and demand strict proof thereof.

144. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 144 of the Complaint, and as such, deny the same and demand strict proof thereof.

145. For response to the allegations contained in Paragraph 145 of the Complaint, it is admitted that Judge Perry ordered custody of the children to DCS. These Defendants are without sufficient information and belief as to the remainder of the allegations contained in Paragraph 145.

146. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 146 of the Complaint, and as such, deny the same and demand strict proof thereof.

147. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 147 of the Complaint, and as such, deny the same and demand strict proof thereof.

148. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 148 of the Complaint, and as such, deny the same and demand strict proof thereof.

149. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 149 of the Complaint, and as such, deny the same and demand strict proof thereof.

150. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 150 of the Complaint, and as such, deny the same and demand strict proof thereof.

151. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 151 of the Complaint, and as such, deny the same and demand strict proof thereof.

152. These allegations contained in Paragraph 152 of the Complaint are denied as stated.

153. The allegations contained in Paragraph 153 of the Complaint are denied.

154. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 154 of the Complaint, and as such, deny the same and demand strict proof thereof.

155. The allegations contained in Paragraph 155 of the Complaint are denied.
156. The allegations contained in Paragraph 156 of the Complaint are denied.
157. The allegations contained in Paragraph 157 of the Complaint are denied.
158. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 158 of the Complaint, and as such, deny the same and demand strict proof thereof.
159. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 159 of the Complaint, and as such, deny the same and demand strict proof thereof.
160. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 160 of the Complaint, and as such, deny the same and demand strict proof thereof.
161. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 161 of the Complaint, and as such, deny the same and demand strict proof thereof.
162. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 162 of the Complaint, and as such, deny the same and demand strict proof thereof.
163. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 163 of the Complaint, and as such, deny the same and demand strict proof thereof.

164. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 164 of the Complaint, and as such, deny the same and demand strict proof thereof.

165. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 165 of the Complaint, and as such, deny the same and demand strict proof thereof.

166. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 166 of the Complaint, and as such, deny the same and demand strict proof thereof.

167. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 167 of the Complaint, and as such, deny the same and demand strict proof thereof.

168. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 168 of the Complaint, and as such, deny the same and demand strict proof thereof.

169. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 169 of the Complaint, and as such, deny the same and demand strict proof thereof.

170. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 170 of the Complaint, and as such, deny the same and demand strict proof thereof.

171. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 171 of the Complaint, and as such, deny the same and demand strict proof thereof.

172. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 172 of the Complaint, and as such, deny the same and demand strict proof thereof.

173. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 173 of the Complaint, and as such, deny the same and demand strict proof thereof.

174. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 174 of the Complaint, and as such, deny the same and demand strict proof thereof.

175. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 175 of the Complaint, and as such, deny the same and demand strict proof thereof.

176. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 176 of the Complaint, and as such, deny the same and demand strict proof thereof.

177. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 177 of the Complaint, and as such, deny the same and demand strict proof thereof.

178. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 178 of the Complaint, and as such, deny the same and demand strict proof thereof.

179. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 179 of the Complaint, and as such, deny the same and demand strict proof thereof.

180. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 180 of the Complaint, and as such, deny the same and demand strict proof thereof.

181. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 181 of the Complaint, and as such, deny the same and demand strict proof thereof.

182. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 182 of the Complaint, and as such, deny the same and demand strict proof thereof.

183. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 183 of the Complaint, and as such, deny the same and demand strict proof thereof.

184. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 184 of the Complaint, and as such, deny the same and demand strict proof thereof.

185. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 185 of the Complaint, and as such, deny the same and demand strict proof thereof.

186. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 186 of the Complaint, and as such, deny the same and demand strict proof thereof.

187. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 187 of the Complaint, and as such, deny the same and demand strict proof thereof.

188. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 188 of the Complaint, and as such, deny the same and demand strict proof thereof.

189. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 189 of the Complaint, and as such, deny the same and demand strict proof thereof.

190. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 190 of the Complaint, and as such, deny the same and demand strict proof thereof.

191. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 191 of the Complaint, and as such, deny the same and demand strict proof thereof.

192. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 192 of the Complaint, and as such, deny the same and demand strict proof thereof.

193. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 193 of the Complaint, and as such, deny the same and demand strict proof thereof.

194. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 194 of the Complaint, and as such, deny the same and demand strict proof thereof.

195. Paragraph 195 of the Complaint does not contain factual averments that warrant a response.

196. Paragraph 196 sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

197. Paragraph 197 sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

198. Paragraph 198 sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

199. The allegations contained in Paragraph 199 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

200. The allegations contained in Paragraph 200 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

201. The allegations contained in Paragraph 201 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

202. The allegations contained in Paragraph 202 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

203. The allegations contained in Paragraph 203 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

204. The allegations contained in Paragraph 204 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations

may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

205. The allegations contained in Paragraph 205 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

206. The allegations contained in Paragraph 206 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

207. The allegations contained in Paragraph 207 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

208. The allegations contained in Paragraph 208 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

209. The allegations contained in Paragraph 209 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

210. The allegations contained in Paragraph 210 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

211. Paragraph 211 of the Complaint does not contain factual averments that warrant a response.

212. Paragraph 212 sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

213. The allegations contained in Paragraph 213 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

214. The allegations contained in Paragraph 214 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

215. The allegations contained in Paragraph 215 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

216. The allegations contained in Paragraph 216 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

217. The allegations contained in Paragraph 217 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

218. The allegations contained in Paragraph 218 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

219. The allegations contained in Paragraph 219 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

220. The allegations contained in Paragraph 220 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

221. The allegations contained in Paragraph 221 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations

may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

222. The allegations contained in Paragraph 222 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

223. The allegations contained in Paragraph 223 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

224. The allegations contained in Paragraph 224 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

225. The allegations contained in Paragraph 225 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

226. Paragraph 226 of the Complaint does not contain factual averments that warrant a response.

227. Paragraph 227 of the Complaint consists of legal conclusions, to which no response is required. To the extent a response is required, the allegations contained in Paragraph 227 are denied as stated as it is not a complete recitation of the law. Furthermore, these

Defendants specifically deny that any action taken by them was done so unlawfully, in violation of any constitutional right of Plaintiffs, or was the legal cause of any injury.

228. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 228 of the Complaint, and as such, deny the same and demand strict proof thereof.

229. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 229 of the Complaint, and as such, deny the same and demand strict proof thereof.

230. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 230 of the Complaint, and as such, deny the same and demand strict proof thereof.

231. The allegations contained in Paragraph 231 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

232. The allegations contained in Paragraph 232 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

233. The allegations contained in Paragraph 233 of the Complaint do not pertain to these Defendants and, as such, no response is required. The allegations contained in Paragraph 231 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the

part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

234. The allegations contained in Paragraph 234 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

235. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 235 of the Complaint, and as such, deny the same and demand strict proof thereof.

236. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 236 of the Complaint, and as such, deny the same and demand strict proof thereof.

237. The allegations contained in Paragraph 237 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

238. The allegations contained in Paragraph 238 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

239. The allegations contained in Paragraph 239 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations

may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

240. For response to the allegations contained in Paragraph 240 of the Complaint, it is admitted only that Defendant Crabtree placed spike strips behind the rear passenger tire of the vehicle. The remainder of the allegations contained in Paragraph 240 are denied.

241. The allegations contained in Paragraph 241 of the Complaint are denied.

242. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 242 of the Complaint, and as such, deny the same and demand strict proof thereof.

243. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 243 of the Complaint, and as such, deny the same and demand strict proof thereof.

244. The allegations contained in Paragraph 244 of the Complaint are denied.

245. The allegations contained in Paragraph 245 of the Complaint are denied.

246. The allegations contained in Paragraph 246 of the Complaint are denied.

247. The allegations contained in Paragraph 247 of the Complaint are denied.

248. Paragraph 248 of the Complaint does not contain factual averments that warrant a response.

249. Paragraph 249 sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

250. The allegations contained in Paragraph 250 of the Complaint are denied.

251. For response to the allegations contained in Paragraph 251 of the Complaint, it is denied that Clayborne was free to leave with the children, pursuant to court orders.

252. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 252 of the Complaint, and as such, deny the same and demand strict proof thereof.

253. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

254. The allegations contained in Paragraph 254 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

255. The allegations contained in Paragraph 255 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

256. The allegations contained in Paragraph 256 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

257. The allegations contained in Paragraph 257 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations

may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

258. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 258 of the Complaint, and as such, deny the same and demand strict proof thereof.

259. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 259 of the Complaint, and as such, deny the same and demand strict proof thereof.

260. The allegations contained in Paragraph 260 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

261. The allegations contained in Paragraph 261 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

262. The allegations contained in Paragraph 262 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

263. For response to the allegations contained in Paragraph 263 of the Complaint, it is admitted only that Defendant Crabtree placed spike strips behind the passenger rear tire of

the vehicle. The remainder of the allegations contained in Paragraph 263 of the Complaint are denied.

264. These allegations contained in Paragraph 264 of the Complaint are denied.

265. These Defendants are without sufficient information and belief as to the allegations contained in Paragraph 265 of the Complaint, and as such, deny the same and demand strict proof thereof.

266. The allegations contained in Paragraph 266 of the Complaint are denied.

267. The allegations contained in Paragraph 267 of the Complaint are denied.

268. The allegations contained in Paragraph 268 of the Complaint are denied.

269. The allegations contained in Paragraph 269 of the Complaint are denied.

270. The allegations contained in Paragraph 270 of the Complaint are denied.

271. Paragraph 271 of the Complaint does not contain factual averments that warrant a response.

272. Paragraph 272 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. Additionally, the allegations contained in Paragraph 272 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

273. The allegations contained in Paragraph 273 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is warranted, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 273, and as such, deny the same and demand strict proof thereof.

274. The allegations contained in Paragraph 274 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is warranted, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 274, and as such, deny the same and demand strict proof thereof.

275. The allegations contained in Paragraph 275 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is warranted, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 275, and as such, deny the same and demand strict proof thereof.

276. The allegations contained in Paragraph 276 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is warranted, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 276, and as such, deny the same and demand strict proof thereof.

277. The allegations contained in Paragraph 277 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is warranted, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 277, and as such, deny the same and demand strict proof thereof.

278. The allegations contained in Paragraph 278 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is warranted, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 278, and as such, deny the same and demand strict proof thereof.

279. The allegations contained in Paragraph 279 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is warranted,

these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 279, and as such, deny the same and demand strict proof thereof.

280. The allegations contained in Paragraph 280 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent a response is warranted, these Defendants are without sufficient information and belief as to the allegations contained in Paragraph 280, and as such, deny the same and demand strict proof thereof.

281. Paragraph 281 of the Complaint does not contain factual averments that warrant a response.

282. Paragraph 282 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

283. To the extent the allegations contained in Paragraph 283 of the Complaint pertain to these Defendants, the allegations are denied.

284. The allegations contained in Paragraph 284 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

285. The allegations contained in Paragraph 285 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

286. The allegations contained in Paragraph 286 of the Complaint are denied.

287. The allegations contained in Paragraph 287 of the Complaint are denied.

288. The allegations contained in Paragraph 288 of the Complaint are denied.

289. The allegations contained in Paragraph 289 of the Complaint are denied.

290. The allegations contained in Paragraph 290 of the Complaint are denied.

291. Paragraph 291 of the Complaint does not contain factual averments that warrant a response.

292. For response to the allegations contained in Paragraph 292 of the Complaint, it is admitted that Defendant Crabtree acted, at all relevant times, under color of state law and within the scope of his employment with Coffee County. These Defendants affirmatively deny that any action taken by them, or any Coffee County officer, was done so unlawfully, in violation of any constitutional right of Plaintiffs, or was the legal cause of any injury.

293. Paragraph 293 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

294. Paragraph 294 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

295. The allegations contained in Paragraph 295 of the Complaint are denied.

296. The allegations contained in Paragraph 296 of the Complaint are denied.

297. Paragraph 297 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish

liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

298. The allegations contained in Paragraph 298 of the Complaint are denied.
299. The allegations contained in Paragraph 299 of the Complaint are denied.
300. The allegations contained in Paragraph 299 of the Complaint are denied.
301. The allegations contained in Paragraph 301 of the Complaint are denied.
302. The allegations contained in Paragraph 302 of the Complaint are denied.
303. Paragraph 303 of the Complaint does not contain factual averments that warrant a response.
304. Paragraph 304 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.
305. Paragraph 305 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.
306. Paragraph 306 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.
307. Paragraph 307 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish

liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

308. Paragraph 308 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

309. Paragraph 309 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

310. Paragraph 310 of the Complaint sets forth legal conclusions which can neither be admitted nor denied. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

311. The allegations contained in Paragraph 311 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

312. The allegations contained in Paragraph 312 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

313. The allegations contained in Paragraph 313 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

314. The allegations contained in Paragraph 314 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

315. The allegations contained in Paragraph 315 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

316. The allegations contained in Paragraph 316 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

317. The allegations contained in Paragraph 317 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

318. The allegations contained in Paragraph 318 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations

may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

319. The allegations contained in Paragraph 319 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

320. The allegations contained in Paragraph 320 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

321. The allegations contained in Paragraph 321 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

322. The allegations contained in Paragraph 322 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

323. The allegations contained in Paragraph 323 of the Complaint do not pertain to these Defendants and, as such, no response is required. To the extent, if any, that such allegations may attempt to establish liability on the part of these Defendants, these Defendants would deny the same and demand strict proof thereof.

324. These Defendants deny that Plaintiff is entitled to damages, remedies of any of the relief requested in the Complaint, including but not limited to the Relief Requested paragraphs A-G.

#### **AFFIRMATIVE DEFENSES**

1. To the extent not already denied in the above paragraphs, these Defendants deny that they violated any constitutional right of Plaintiff, violated any state law, or that any action by them was the legal cause of any injury to Plaintiff.
2. While denying any fault whatsoever, these Defendants rely on the doctrine of comparative fault of Plaintiff Clayborne.
3. These Defendants affirmatively assert that the Complaint fails to state a claim for which relief can be granted under Fed. Rule of Civ. Pro. 12(b)(6) and dismissal should be granted in its entirety.
4. Defendant Crabtree affirmatively asserts the doctrine of qualified immunity as a defense to all claims raised by the Plaintiffs. At all relevant times, Defendant Crabtree's actions were reasonable and did not violate any clearly established constitutional right possessed by Plaintiffs. A reasonable officer in Crabtree's position would assume he could rely upon the representations of DCS workers, other officers on the scene, and court orders which provided him the necessary authority to execute the same.
5. These Defendants affirmatively assert that they are not liable to Plaintiffs for attorney's fees.
6. These Defendants affirmatively assert that they are entitled to attorney's fees and costs pursuant 42 U.S.C. § 1988 and/or Tenn. Code Ann. § 29-20-113.

7. These Defendants assert immunity under Tenn. Code Ann. § 55-8-108(e) for any injury proximately or indirectly caused to Plaintiff who was fleeing pursuit by law enforcement personnel.
8. These Defendants affirmatively assert and rely upon all defenses and immunities to which they may be entitled pursuant to the Tennessee Governmental Tort Liability Act, Tenn. Code Ann. § 29-20-101, *et seq.*
9. Pursuant to Tenn. Code Ann. § 29-20-205, immunity is not removed for claims for false arrest.
10. These defendants plead the limitations found at Tenn. Code Ann. § 29-20-310.
11. Coffee County cannot be liable for punitive damages because it is a municipality. See *City of Newport v. Fact Concerts, Inc.*, 453 U.S. 247 (1981). Any claim for punitive damages should be dismissed.
12. These Defendants affirmatively allege that the damages requested by Plaintiffs for compensatory and for punitive damages are excessive and in violation of the due process clause of the United States Constitution. *BMW of N. America v. Gore*, 517 U.S. 559 (1996); *State Farm Mut. Auto Ins. Co. v. Campbell*, 538 U.S. 408 (2003). These Defendants plead the limits on punitive damages found at Tenn. Code Ann. § 29-39-104. Any remaining claim for punitive damages, which should be dismissed, should also be bifurcated.
13. These Defendants affirmatively assert all defenses and immunities available to them under the public duty doctrine.
14. As to Defendant Coffee County, Plaintiffs have not sufficiently alleged a policy, practice or procedure that would give rise to municipal liability under *Monell v. Social Services of the City of New York*, 436 U.S 658 (1978).

15. Any averment not previously admitted or denied is hereby denied as if the same is specifically set out herein.
16. These Defendants specifically reserve the right to amend their Answer pursuant to the Federal Rules of Civil Procedure and the Scheduling Orders of the Court.
17. Should Plaintiffs' claims not be dismissed in their entirety, these Defendants request a trial by jury with the maximum allowable jurors permitted by the Court and law.

Respectfully submitted this 14<sup>th</sup> day of March, 2024.

s/Gina S. Vogel  
\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 14<sup>th</sup> day of March, 2024, a true and exact copy of this Answer was filed electronically. Notice of this filing will be sent by operation of the court's electronic filing system to all parties indicated on the electronic filing receipt as follows:

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s/Gina S. Vogel

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Attorney